

EXHIBIT 4

Volume 1
Carlos Lopez Alaniz, Jr.

**Kirkman vs.
State of California**

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE CENTRAL DISTRICT OF CALIFORNIA
3
4 SANDRA KIRKMAN AND CARLOS) Case No.
5 ALANIZ, INDIVIDUALLY AND AS) 2:23-cv-07532-DMG-SSC
6 SUCCESSORS-IN-INTEREST TO)
7 JOHN ALANIZ, DECEASED,)
8)
9 Plaintiffs,)
10)
11 v.)
12)
13 STATE OF CALIFORNIA; RAMON)
14 SILVA; AND DOES 1-10,)
15 INCLUSIVE,)
16)
17 Defendants.)
18 _____)

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21
22 REMOTE DEPOSITION OF CARLOS LOPEZ ALANIZ, JR.

23 VOLUME 1

24 La Habra, California

25 Wednesday, June 19, 2024

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22 Reported by:
23 DENISE MARLOW
24 RPR, CSR No. 11631

25 Job No. 10143232

PAGES 1 - 51

Volume 1
Carlos Lopez Alaniz, Jr.

Kirkman vs.
State of California

1 Q. Okay. So I want to ask you just a few
2 background questions about John. And, again, this isn't
3 meant to upset you or anything of that nature. Again,
4 I'm just trying to obtain facts.

5 To your knowledge, had John ever been arrested?

6 A. No.

7 Q. To your knowledge, did he ever serve any time in
8 jail or prison?

9 A. No.

10 Q. And to your knowledge, did John ever use any
11 drugs or controlled substances?

12 A. No.

13 Q. And to your knowledge, did John ever undergo
14 treatment at any drug treatment facilities?

15 A. No.

16 Q. To your knowledge, did John ever undergo
17 treatment at any alcohol treatment facilities?

18 A. No.

19 Q. To your knowledge, did John ever suffer from any
20 sort of psychological problems?

21 A. Yes.

22 Q. And can you describe what psychological problems
23 he suffered from, that you're aware of?

24 A. Well, he was diagnosed at the VA hospital, PTSD
25 and bipolar.

Volume 1
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REPORTER'S CERTIFICATION

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3 I, Denise Marlow, Certified Shorthand Reporter
4 in and for the State of California, do hereby certify:

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6 That the witness named in the foregoing
7 deposition was, before the commencement of the
8 deposition, duly administered an oath in accordance
9 with the Code of Civil Procedure Section 2094; that
10 the testimony and proceedings were reported
11 stenographically by me and later transcribed through
12 computer-aided transcription under my direction and
13 supervision; that the foregoing is a true record of the
14 testimony and proceedings taken at that time.

15

16 IN WITNESS WHEREOF, I have hereunto subscribed
17 my name this 3rd day of July, 2024.

18

19 *Denise Marlow*
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Denise Marlow, CSR No. 11631

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